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March 24, 2020

By ECFThe Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007*Kaloma Cardwell v. Davis Polk & Wardwell LLP, et al.*
19-cv-10256-GHW (S.D.N.Y.)

Dear Judge Woods:

We represent defendants in the above-captioned matter. We respectfully request two accommodations.

First, in light of the difficulties resulting from the COVID-19 pandemic, we respectfully request, pursuant to section 1.E of Your Honor's Individual Rules of Practice in Civil Cases, an additional thirty (30) days to answer or otherwise respond to plaintiff's amended complaint. The current deadline is March 31, 2020, and defendants request an extension to April 30, 2020. ECF 40. This is defendants' second request for an extension of time with respect to this deadline, and would not affect other scheduled dates.

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The Honorable Gregory H. Woods

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Second, in lieu of filing individual motions to dismiss the amended complaint, defendants currently anticipate filing a consolidated motion. Defendants seek leave of the Court to file a memorandum of law five pages longer (35 pages) than the present page limit of 30 pages. The Court granted leave to file a memorandum of 30 pages on February 20, 2020. ECF 32. Defendants respectfully submit that additional pages are necessary, and would favor judicial efficiency, in light of plaintiff's addition, in the amended complaint, of over forty pages of allegations, nine legal claims, and an eighth individual defendant not named in any previous proceeding.

We have consulted with David Jeffries, counsel for plaintiff. On behalf of plaintiff, Mr. Jeffries takes no position with respect to these requests.

If the Court requires any further information in support of these requests, defendants will respond promptly to the Court's instructions.

Thank you for the Court's attention to this matter.

Respectfully submitted,

/s/ Bruce Birenboim
Bruce Birenboim

cc: Counsel of Record (*Via ECF*)